

In the Matter of)
)
E9-1-1 Requirements for) WC Docket 05-196
IP-Enabled Service Providers)
)

APCO is particularly concerned with comments suggesting that the way for VoIP providers to deliver 9-1-1 service is for PSAPs to convert to IP-based technologies. Putting aside the question of whether IP is the right technological direction for PSAPs to follow, advocates of that approach fail to address the enormous costs that would be imposed on cash-strapped PSAPs. Most PSAPs are publicly funded, either through general revenue, subscriber fees, or a combination of both. They cannot possibly bear the financial burden of a rapid replacement of their imbedded base of equipment and

systems.¹ Thus, APCO has consistently argued that, at least for now, VoIP providers and other new telephone services must deliver 9-1-1 calls to the *existing* PSAP infrastructure. That must be a fundamental requirement of any voice communications service that interconnects to the public switched telephone network. Eventually, an IP-based solution may be in place, but the public's safety cannot put on hold for a distant solution to be funded and implemented.

Some VoIP providers also suggest that application and enforcement of E9-1-1 rules should be put aside, pending development of new technical methods and standards. We disagree. The E9-1-1 infrastructure in this nation has been in place for many years. The VoIP industry should have anticipated the need to deliver E9-1-1, and designed that into their systems, with appropriate standards as needed. Then, the technical methods and standards would have been in place *before* service was offered, and before lives were placed at risk. Instead, at least some of the industry marched ahead into the marketplace without 9-1-1 or E9-1-1 capability, leading to disastrous results. Now is the time to ensure that VoIP services offer E9-1-1 capability.

Vonage suggests that the VoIP E9-1-1 requirements should only apply in geographic areas in which a VoIP provider has a "reasonable" number of customers, and that "alternative means" of connection to PSAPs should be used in the interim for those areas. We question how such a reasonable number could be established. How many lives are "too many" to put at risk? The "alternative means" noted by Vonage would involved accessing PSAPs through ten-digit administrative numbers, a "solution" that has

¹ Nor is there any near-term likelihood of meaningful Federal funding for such upgrades. At present, Congress is unwilling to appropriate even the minimal funds needed to operate an already authorized 9-1-1 Program Office, let alone a fraction of the cost of funding wireless E9-1-1 upgrades (or the far more expensive conversion to IP-based technology).

already proven to be dangerous as it routes emergency calls to numbers that are often either unanswered or “answered” by voicemail informing callers that “if this is an emergency, please hang up and dial 9-1-1.” Such calls to administrative numbers also lack location and call-back information that is vital for effective emergency response.

Finally, many of the initial comments address technologies and methods for identifying the location of VoIP callers. APCO believes that, for fixed applications, calls must be identified using standard Master Street Address Guide (MSAG) addresses. Any approach that relies upon geographic coordinates will fail to take into consideration dense residential/business areas, where a single coordinate (however accurate it may be) could encompass multiple addresses.

CONCLUSION

APCO greatly appreciates the attention given to this issue by the Commission, and looks forward to working with the Commission and other parties to ensure that VoIP services provide full E9-1-1 capability for the benefit of the public.

Respectfully submitted,

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